

**Masika Brown Ray**

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**FILED**

FEB 7 2023

Clerk, U.S. District Court  
Texas Eastern

**IN THE DISTRICT COURT OF EASTERN DISTRICT OF TEXAS,**  
**MARSHAL DIVISION**

CASE NO.

2:23CV46  
JRG/RSP

**Masika Brown Ray**

Plaintiff (Pro Se),

Vs.

**Sheriff Cerliano**

Gregg Co. Sheriff's Department  
101 E Methvin St #559  
Longview, TX. 75601

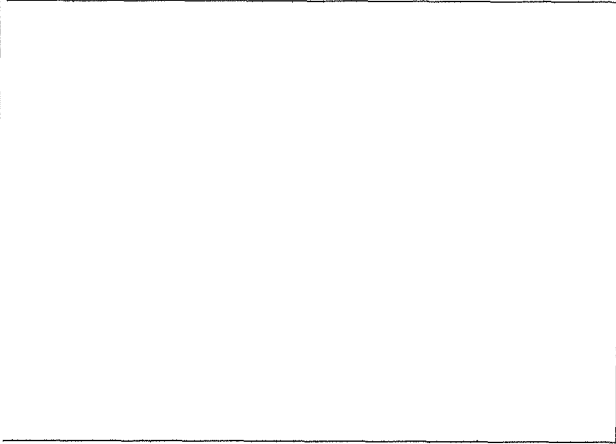
**Chief Anthony Boone**

Longview Police Department  
302 W. Cotton St. Longview, Texas  
75601

Defendants.

**COMPLAINT AGAINST THE  
DEFENDANTS TO:**

- SEEK DECLARATION OF THE VIOLATION OF PLAINTIFF'S RIGHTS;
- SEEK REMEDIES AGAINST THE INFRINGEMENT OF PLAINTIFF'S RIGHT OF FAIR TRIAL, EQUAL PROTECTION OF LAW, RIGHT OF LIBERTY AND FREEDOM FROM UNDUE ARREST AND DETENTION;
- COMPENSATION AMOUNTING TO \$3 MILLION AGAINST ALL THE AGONIES, MENTAL AND PHYSICAL TORTURE;
- DECLARATION TO SEEK A DETAILED REPORT

- 
- ABOUT DEFENDANTS' OFFICERS INVOLVED IN SUCH VIOLATIONS; AND
  - DETAILS OF DISCOVERIES PACKET;
  - PUNITIVE DAMAGES AMOUNTING TO \$10 MILLION; AND
  - OTHER EQUITABLE AND JUST REMEDIES.

Here Comes the Plaintiff, **Masika Brown Ray** (Pro Se) and submits her assertions before this honorable court to seek the appropriate remedies under the applicable laws and procedures:

**I. Parties, Jurisdiction and Venue**

1. Plaintiff is and was at all times relevant hereto resident of the State of Texas and all the events, actions, irregularities, illegalities, transgression of law and infirmities subject to this complaint have occurred in Gregg County, as Plaintiff resides in Rusk County.

2. The Defendants are and were at all times relevant hereto residents of the State of Texas and all the events occurred in this County hence this honorable court is competent to adjudicate and decide the matter in hand.

3. The Venue is proper in this proceeding.

**II. Standard to review the pleadings of pro se litigants:**

4. Plaintiff is a pro se litigant and has not hired an attorney. Thus, as far as the pleading standard of Pro Se litigants is concerned, they are always entitled to a less stringent view by the Honorable Superior Courts. Pro Se litigants are not supposed to be jurists hence their pleadings are entitled to a kind and

1 lenient standard of review by the courts. This is held time and again in the  
2 judgments of the apex courts, some of them are quoted as under:

3 “[W]e hold pro se pleadings to a less stringent standard than formal  
4 pleadings prepared by lawyers.”). Ashelman v. Pope, 793 F.2d1072, 1078 (9th  
5 Cir. 1986).  
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7  
8 The Supreme Court has instructed federal courts to liberally  
9 construe the ‘in artful pleading’ of pro se litigants. Eldridge v. Block, 832 F.2d  
10 1132,1137 (9th Cir. 1987).  
11

12 A pro se pleading is held to a less stringent standard than more  
13 formal pleadings drafted by lawyers. Estelle v. Gamble, 429 U.S. 97, 106, 97 S.  
14 Ct. 285, 50 L. Ed. 2d 251 (1976)”.  
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16 Therefore, in the light of the above-mentioned judgments, the  
17 plaintiff as a Pro Se litigant is entitled to a lenient review of her pleadings and  
18 seeks the kind favor of this honorable court.  
19

20 **III. ALLEGATIONS BASED ON FACTS ESCALLATING THE**  
21 **CONTROVERSY**

22 5. That the plaintiff is before this honorable court to submit her  
23 assertions against the violation of her right of freedom, privacy, seclusion, peaceful  
24 enjoyment of living, right to equal protection of law, freedom from arrest and  
25 detention, right of liberty and constitutional rights. I was subjected to personal  
26 injuries and had been wounded by the subordinates/officers of the defendants.  
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1           6.     The defendants have acted prejudicially against me by not allowing  
2 me to get as fair notice, by placing their hands on me with excess force, and  
3 prejudicially refused the plaintiff to live freely as a law-abiding citizen of the USA.  
4 They inflicted various injuries to me while arresting me and then taken me to jail  
5 without any criminal charges.

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7           7.     That on April 29, 2022, the plaintiff was assaulted by the officers of  
8 defendants, and I suffered a great injustice by the conduct and inhuman treatment  
9 of their police officers. Please See [https://ring.com/share/f9eb21e7-fbb9-4494-](https://ring.com/share/f9eb21e7-fbb9-4494-beeee-cb1bda62f000)  
10 [beeee-cb1bda62f000](https://ring.com/share/f9eb21e7-fbb9-4494-beeee-cb1bda62f000).

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14           8.     That the plaintiff has never been in trouble before this. I am a mother  
15 with two children, one with special needs. I am an African-American woman in  
16 origin, college educated, and I volunteer in my community. But despite this I was  
17 subjected to the harsh and un-equal treatment by the defendants and their  
18 subordinates/officers. Instead of taking me to a hospital in my time of need, they  
19 beat me and took me to jail, where I was forced to stay for 10 days, in spite of my  
20 brother and Realtor's attempts to bail me out.

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26           9.     The plaintiff already had a nervous breakdown after a banking legal  
27 issue that began with a preacher/contractor who stole from me and my family due  
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1 this fraud, it made troubles for me obtaining a new loan. See Exhibits 8-10. It is  
2 Exhibit 10, where I had to explain over and over about the circumstances to  
3 ultimately obtain the loan, that resulted in my nervous breakdown. I had to  
4 explain how the house situation by the preacher/contractor had affected my child  
5 with special needs, leading to a financial setback. Exhibit 10, the explanation, was  
6 all that I could take, resulting in the nervous breakdown.  
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11 10. But due to the defendants' conduct a lot happened in the night of 4-  
12 29-22, and I suffered from immense mental and physical torture. I was beaten and  
13 taken to the jail by the defendants in a condition when I was supposed to be taken  
14 to the hospital.  
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19 11. That after the arrest of the Plaintiff, defendants and their police  
20 officers/subordinates LIED on the Affidavit of Removal with CPS (Child  
21 Protection Service), and stated that I was completely naked when they came to  
22 my apartment, and I was abusing my kids. See Exhibit 11. Due to their lies and  
23 violation of my Constitutional rights, I was forced to pursue another litigation in  
24 Family court. I had to represent myself in court, after terminating my costly  
25 attorney, as Pro Se, and I WON to get my kids back. The court dismissed the  
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1 complaint of CPS as it was all perpetrated with lies and grievous infirmities. For  
2 the kind perusal of this honorable court, I have attached the order (November 17,  
3 2022) of dismissal of the CPS's complaint, and I also WON the motion to return  
4 September of 2022. See Exhibits 12- 13.  
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8 12. The officers of the defendants purposefully lied and reported to the  
9 CPS that I was not a good mother for my kids. But when I explained everything  
10 and provided proofs, the court understood that the police were lying against me.  
11 Thus, this honorable court can understand that I have suffered a lot due to lies of  
12 the defendants' subordinates.  
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17 13. That due to various illegal acts and violations of Plaintiff's  
18 constitutional rights I have been subjected to various traumas and PTSD. To  
19 prove this fact, I have attached the medical observation of Dr. French's  
20 assessment as an exhibit to this compliant. Dr. French stated that the police should  
21 have taken me to the hospital instead of jail. See Exhibit 14, Dr. Wade E. French,  
22 Ed.D. Forensic Risk Assessment, which states, "Unfortunately, Mrs. Ray was  
23 taken to jail rather than a mental hospital where her condition could have been  
24 better diagnosed, understood and treated. It is not unusual for an individual to  
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1 experience this disorder and have no reoccurrence.” Additionally, see  
2 correspondence to my doctor after having a panic attack at the dentist, due to the  
3 defendants. If felt like the dentist and her assistant were trying to hurt me like the  
4 police. See Exhibits 14 - 15.  
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8 14. That the defendants have plaintiff’s \$1,000 + dollar cell phone as  
9 evidence, but they are not telling me about its use or return. As, I have paid more  
10 on my phone bill due to purchasing another phone, when still owing on the iPhone  
11 the police obtained. As of 2/7/23, the date of this original complaint submission,  
12 I currently have to call the Snoddy Bails Bond every Monday because the police  
13 have NOT dropped the charges against me. I won a Motion for Monitored Return  
14 in September of 2022, getting my daughter back. Since then, every month I have  
15 asked the District Attorney’s office in Longview, Texas, when were they going  
16 to drop the charges or do something, so I could get my phone back. My requests  
17 have fallen on deaf ears, like all else with the departments.  
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24 15. At the time of the arrest, the defendants’ police officers used  
25 excessive force against the plaintiff including repeated beatings and inhuman  
26 handling which resulted a lot of injuries to me. The marks on plaintiff’s body are  
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1 evidence of the pain and suffering I endured due to the defendants' officers  
2 apparent wrath unraveled and manifested into physical force.  
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5 16. The plaintiff strongly asserts that all the actions during my arrest  
6 were in direct contravention of the precepts of the fourth amendment to the United  
7 States constitution. Thus, I am before this honorable court to seek applicable  
8 remedies.  
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11  
12 17. After the arrest, defendants continued their illegal and unjust acts to  
13 torture and hurt the plaintiff. I was held for ten days in Gregg County jail and  
14 several requests for my bail from my brother and realtor were unjustly denied.  
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16 The plaintiff was denied the right to sufficient medical attention, as the plaintiff's  
17 brother told the jail of her taking blood pressure medicine and other. Additionally,  
18 the defendants' officers offered no significant help to help treat my wounds.  
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23 18. I made several requests and reports regarding this cruel behavior of  
24 defendants, including a personal request by CPS's appointed psychologist. But  
25 defendants have failed to take any appropriate steps to resolve my issues and my  
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1 agonies continued while in detention. The defendants lied to the psychologist  
2 when she asked about my wounds. See Exhibit 16, page 5.  
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5 19. That the officers responsible for this injustice answered  
6 questions/inquires with blatant lies, arguing that the plaintiff never asked for help.  
7 It is a white lie, and I have several proofs to support my stance. I have submitted  
8 a lot of requests for medical assistance and the treatment of my wounds, but they  
9 fell on deaf ears. See Exhibits 17 – 18. On Exhibit 17, I was asking for help for  
10 my wounds and I had a headache, as a result of the beatings and because I did not  
11 have my blood pressure medicine that my brother told them that I needed. Exhibit  
12 18, illustrates that my lips were extremely dry, as I had stopped eating and  
13 drinking because I knew they had tried to poison me. I asked a kind jailer for food  
14 from elsewhere, and she brought me a sandwich, as I was afraid to eat jail food.  
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21 20. That the defendants intended to end my life while in the holding me  
22 in cell/illegal detention. Additionally, they failed to make any efforts to treat me  
23 as per laws. If the plaintiff was a white woman, I would not have been treated in  
24 such a cruel manner.  
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1           21. That the plaintiff has sufficient reason to believe that the death of  
2 one of the women in the neighboring cell was associated with an attempt by the  
3 officers at Gregg County police officers to end my life, possibly due to their  
4 knowledge of excessive force and beatings of me at the time of the arrest, as  
5 ONLY PART of their mistreatment was caught on my Ring camera.  
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9           22. That the plaintiff can recognize the jailer who attempted to end my  
10 life. She is a short dark-skinned African American woman. She pointed at me and  
11 then an inmate told her OKAY with a nod. Thereafter, that inmate got with a  
12 group of women and they mixed some drink. I watched and listened, as I prayed  
13 to God to confuse the enemy and spare my life. God saved me on numerous  
14 occasions. I can testify about what happened to me and how they subjected me to  
15 inhuman treatment.  
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21           23. That the plaintiff requested the defendants to open my case records  
22 on two different occasions. But I received nothing from defendants and all of my  
23 request were ignored or not fulfilled. Thus, the defendants have not with clean  
24 hands, they were continuously making their plans to injure me in person and  
25 mentally. Their conduct is clear evidence of the fact that they were cooking  
26 something against me with their ulterior motives. Thus, I am before this honorable  
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1 court to seek appropriate remedies and damages to compensate me against my  
2 agonies.

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5 24. That all of the aforementioned injustices and illegal acts committed  
6 on the behest of defendants contravened Plaintiff's inalienable rights. I have  
7 consulted with a Civil Rights attorney, and the Texas Rangers and FEDs have  
8 initiated investigations on my request against the defendants. Furthermore, the  
9 federal civil rights organization has assured me that an investigation is currently  
10 ongoing in my case. But I am seeing no progress in this regard hence I am before  
11 this honorable court. Additionally, the DOJ suggested obtaining an attorney  
12 regarding the civil matter, as I am here, as Pro Se.  
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18 25. I have sent a legal demand letter to defendants in an attempt to  
19 resolve this matter amicably, and they have acknowledged its receipt. But I have  
20 seen no progress and intent from defendants. Thus, I am present before this  
21 honorable court.  
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26 26. That the plaintiff is entitled to damages and compensations  
27 amounting to \$13M against all my troubles, agonies, illegal detention and  
28 injustices.

1  
2 27. That the defendants have blatantly violated my rights under the  
3 freedom of information act (5 USC S. 552), 4th amendment of the US  
4 Constitution, *under 42 U.S.C. Section 1983*, 25CFR S. 11.411, the privacy act of  
5 1974 and other applicable laws and regulations. Thus, this honorable court should  
6 probe into this matter and grant me appropriate remedies.  
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11 28. The plaintiff is entitled to seek remedies provided to me under the  
12 above-mentioned provisions or as considered just and proper by this court and to  
13 proceed with a jury trial.  
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17 29. The defendants have conducted in such a way that they violated  
18 plaintiff's rights granted to me under 42 USC 1983 and acted in a biased and  
19 prejudiced manner against plaintiff.  
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23 30. The defendants tried to suppress my voice and tried to block my  
24 fundamentally accepted rights of liberty, privacy and freedom to live that's why  
25 I have been subject to an unfair and unlawful conduct collectively from all of the  
26 defendants.  
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1  
2 31. That the plaintiff is a God-fearing woman. I am not afraid. I have  
3 tangible evidence to support the truth against every lie told about me and to shun  
4 unjust incrimination. I did not push anyone in jail, but I brought three women to  
5 Christ, while I was detained in jail. That was priceless! After finally getting out  
6 of jail, I added money to 6 homeless women: Lizzie Brooks, Sherry Choice,  
7 Shonda Phillips, Carla Harnage, Jamie Marshall and Megan Turner. Please note,  
8 it was Jamie Marshall who assisted in the attempt on my life. Jamie also begged  
9 for socks, cokes, and other basics. Regardless of her crimes, I showed her love.  
10 See Exhibits 19 – 20. I will also call upon these women as witnesses at trial.  
11 Nevertheless, I am committed to help those who are victims of the police and  
12 CPS. I now have a consulting business name called *My Children are NOT your*  
13 *Toys*. Thus, the plaintiff is before this honorable court to seek damages,  
14 declaration and appropriate remedies. Ironically, while I was helping the  
15 homeless, you can see on Exhibit 20, that I was homeless at the time too, due to  
16 the defendants. *I had lost my apartment and had to stay at the Courtyard by*  
17 *Marriott, owned by Mr. Paresh Patel and J. Longview Hospitality, located at*  
18 *1125 E. Hawkins Parkway, Longview, TX. 75605.*  
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**DETAIL OF EXHIBITS AND SUPPORTING VIDEOS:**

1. The Demand letter.

2. The return receipt from the demand letter,

3. Medical evidence of my wounds.

4. Video of the police approaching me at 12:02 a.m. and slamming me against the wall: <https://ring.com/share/f9eb21e7-fbb9-4494-beee-cb1bda62f000>

5. Video at 12:03.41 a.m. of me saying, "Happy Easter," and more. <https://ring.com/share/e22a79ef-aef0-4dbd-86df-af2d1416beee>

6. Video of police showing compassion to my white neighbor:

<https://ring.com/share/db542a7a-8971-44a5-8d58->

[ac3bf7627e84?fbclid=IwAR229UP5JY3LRIUJuQE7PydIjHuLwdvahBOYRMU  
Lbrw1hUGyCWHf5Hvy\\_m8](https://ring.com/share/db542a7a-8971-44a5-8d58-ac3bf7627e84?fbclid=IwAR229UP5JY3LRIUJuQE7PydIjHuLwdvahBOYRMULbrw1hUGyCWHf5Hvy_m8)

7. Video of police talking about my Ring cameras like he had something to hide from inside too: <https://ring.com/share/8e8c5368-7bf2-46b7-8635-692a9c47d469>

8. Mediated Settlement Report, regarding the house that was not completed by the preacher/contractor.

9. Motion to Compel, still trying to collect from the preacher/contractor, James Dancy of Longview, TX.

10. The gut-wrenching letter to Regions Bank's underwriting department where I had to describe the results of the harm by the preacher/contractor, suffered by us

1 and most importantly my autistic daughter, resulting in her going to a dangerous  
2 mental health hospital due to our lack of stability at that time. She was used to  
3 having her own room and she had to share, as we had to live with my mother due  
4 to James Dancy, the preacher/contractor, as I had to spend my life's savings on  
5 completing the house to sell.  
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7  
8 11. A page from the Affidavit of Removal, as the police stated that I was  
9 "completely naked", when they arrived. Yet, my Ring video shows that I had on a  
10 towel, my back was wet, and I was trying to bring in my valet trash can.  
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12 12. A copy of the Order to Dismiss, signed by the judge on November of 2022, as  
13 I won as Pro Se. I had my daughter back since September of 2022, as I had also  
14 won on a Monitored Return, as Pro Se.  
15

16 13. The Motion to Dismiss, filed by me, the defendant, in that case, as I won as Pro  
17 Se. Many of the details are as described in this petition, as I continue to state the  
18 abuse by the police.  
19

20 14. Dr. Wade E. French, Ed.D. Forensic Risk Assessment, which states,  
21 "Unfortunately, Mrs. Ray was taken to jail rather than a mental hospital where her  
22 condition could have been better diagnosed, understood and treated. It is not  
23 unusual for an individual to experience this disorder and have no reoccurrence."  
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26 15. MyChart message to my doctor, Dr. Reddy about panic attacks, due to PTSD  
27 as a courtesy of the police.  
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1 16. Kranz Psychological Services, PLLC Evaluation results. On page 5, states what  
2 I have been stating over and over about the police beating me, attempts on my life  
3 and under Information from Outside Sources, the police related to Kranz, "...there  
4 were no requests for medical attention consistent with Ms. Ray's injuries."  
5

6 17. Gregg County Jail – Request/Grievance, where I asked for help to treat my  
7 wounds, my injuries on the jail's forms.  
8

9 18. Gregg County Jail – Request/Grievance, where I asked for help for Vaseline  
10 for my lips, as they were dry due to my not eating and drinking, fearful of being  
11 poisoned.  
12

13 19. My notes on a Regions Bank envelope to send Lizzie Brooks \$20.00, Sherry  
14 Choice \$25.00, Shonda Phillips \$25.00, Carla Harnage \$50.00, Jamie Marshall  
15 \$25.00, and Megan Turner \$50.00 to homeless women in Gregg County jail.  
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17 20. My bank statement from Regions Bank, illustrating that on 5/16/22, I, Masika  
18 Akilah Brown Ray, the Plaintiff, victim of the police and sheriff's department, sent  
19 money and was charged a service charge to the homeless women in Gregg County  
20 jail. That is who I am, I love and I act in love, keeping my word, as a servant of  
21 God. Laus Deo.  
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27 **COUNT 1:**

28 **Prejudice**

1           1. Plaintiff incorporates as if fully restated all of the allegations  
2 previously written, mentioned, pointed out by the Plaintiff.

3           2. Plaintiff has been living peacefully and have not received any police  
4 report or complaint from the police department prior to this. I am further ready to  
5 assist this honorable judicial forum to provide proofs of my peaceful residence and  
6 enjoyment of my rights.

7           3. But the Defendants hampered Plaintiffs' rights of peaceful enjoyment,  
8 liberty, equal protection of law, fair trial and unlawfully trespassed my private  
9 property to cause humiliation and mental torture by arresting me for no cause.

10           4. Defendants engaged in professional malpractice and coercive tactics  
11 against the Plaintiffs through the biased, discriminatory, derogatory and prejudicial  
12 conduct.

13           5. Thus, the plaintiff is present before this honorable court and seeks  
14 appropriate remedies available to them under the law.  
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16  
17                           **COUNT 2:**

18           **Violation of rights granted to the plaintiff under Title 18 Sections of US**  
19                           **Code**

20           6. Plaintiff incorporates as if fully restated all of the allegations  
21 previously written, mentioned, pointed out by the Plaintiff.

22           7. Defendants' conduct was not right throughout their presence and  
23 interrogation. Plaintiff was subject to inhuman and unfavorable treatment without  
24 any justification.

25           8. Thus, the plaintiff is before this honorable court to seek his remedies.  
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27                           **COUNT 3:**  
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**Personal Injury, Violation of my Constitutional rights,  
Trespass and Malicious Prosecution (Title 42 of US Code)**

9. Plaintiff incorporates as if fully restated all of the allegations previously written, mentioned, pointed out by the Plaintiff.

10. The defendants collectively and jointly have caused me various injuries/wounds and subjected me to detention without any solid evidence.

11. During their stay and arrest of the plaintiff I was subject of multiple biases which plaintiffs tried to ignore at first. But when defendants did not take plaintiffs' peaceful attempts to seek explanation of her unlawful arrest seriously thus there was no choice left with plaintiff but to file this complaint.

12. Defendants have acknowledged my legal demand letter but could not offer any solutions. They have failed miserably to explain the purpose of transgressing plaintiffs' constitutional rights.

13. The conduct of the defendants damaged and snatched the fundamental rights of the plaintiff and prejudiced against her celebrated civil rights and remedies.

14. Plaintiff is confident, sure and affirm, that based on these allegations, in addition to the malpractices of the defendants as enumerated above, Defendants may have engaged in these discriminatory practices against the plaintiff to which I was not yet fully aware. At such time as such discriminatory, retaliatory, practices become known, Plaintiff will seek to amend this Complaint in that regard.

15. As a direct and proximate result of the Defendants' willful, knowing, and intentional discrimination and retaliation against Plaintiff, Plaintiff have suffered and will continue to suffer pain, humiliation, emotional distress, loss of earnings, and other liberties and opportunities.

16. Hence, Plaintiff is hereby entitled to general and compensatory damages amounts demanded or to be proven at trial or through evaluation of this Honorable Court.

#### **COUNT 4:**

#### **Targeting, Violence, Disregard of my Civil Rights under Title VII of US Code and Misuse of Authority**

17. Plaintiff intended that all of the acts and allegations mentioned hereinbefore and after this count to be considered as reinstated in this count as well.

18. The main reason of such mysteries and unexplained volition of my rights, excessive force, beatings, trespassing on plaintiff's property, searching and finding my cameras, asking my then 10-year-old daughter for my iPhone passcode, continued searching through my iPhone, attempts on my life in jail, and more might be that I am black woman with evidence of the police's wrongdoings on my Ring videos, and that I am from African origin. But despite of several written and verbal requests the defendants are adamant to provide a solid justification of violating my rights. Thus, plaintiff is fearful of state-owned departments that they might cause irreparable loss to plaintiff without any warrant and justification in future.

19. Thus, plaintiff is before this honorable court to seek appropriate remedies.

#### **COUNT 5:**

#### **BIAS and Violation of Constitutional (4<sup>th</sup> and 5<sup>th</sup> amendments) Rights and Discrimination**



28. The conduct of the defendants damaged and snatched the fundamental rights of the plaintiff and prejudiced against my celebrated civil rights and remedies.

30. As a direct and proximate result of the Defendants' willful, knowing, and intentional malicious prosecution, tortuous interference and retaliation against Plaintiff, Plaintiff has suffered and will continue to suffer pain, humiliation, emotional distress, loss of earnings, and other liberties and opportunities.

**COUNT 8:**

32. Plaintiff incorporates by reference and re-avers each and every paragraph above.

1 allegations of the subordinates of defendants I have been facing various traumas  
2 and different treatment from the society.

3 34. Thus, the plaintiff is entitled to kind favor of this honorable court.

4  
5 **COUNT 9:**

6 **General Damages**

7 35. Plaintiff incorporates by reference and re-avers each and every  
8 paragraph above.

9 36. As a direct and proximate result of the Defendants' intentional  
10 fraudulent practice, Plaintiff suffered damages allowed by law in an amount in  
11 excess of \$13 Million.

12 37. Thus, the plaintiff is before this honorable court to seek the help of  
13 this prestigious forum.

14  
15 **COUNT 10:**

16 **Punitive Damages**

17 38. Plaintiff re-alleges the allegations set forth in this complaint and  
18 incorporates same herein by reference.

19 39. Defendant's outrageous conduct towards the Plaintiff was done with  
20 malice or bad motives or reckless indifference to plaintiff's interests.

21 40. Accordingly, Defendants are liable in damages to Plaintiff in excess  
22 of \$13 Million or to be proven in trial, the exact amount to be proven at trial.

23 **PRAYERS/ SUBMISSIONS:**

24 WHEREFORE, Plaintiff, **Masika Brown Ray**, demands judgment  
25 against Defendants, favoring Plaintiffs in the amounts which will compensate her  
26 for:

- 27 i. Violation of my rights under Title 18 and 42 of the US Code;  
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- ii. Punitive damages amounting to \$13 Million intended to reform or deter the Defendant, and, from engaging in conduct like that which formed the basis of the lawsuit;
- iii. Compensatory damages for pain, agony, and suffering of Plaintiffs due to prejudicial and biased conduct of Defendants that was especially outrageous against the plaintiffs;
- iv. Costs expended herein, including reasonable legal counseling fees and of his legal expenditures;
- v. Pre-judgment and post-judgment interest;
- vi. A declaratory judgment in plaintiff's favor;
- vii. A direction to the defendants to provide the details and report of my arrest and the discovery packages collected therein;
- viii. A direction to release the mobile of plaintiff which is illegal kept by defendants;
- ix. If this honorable court deems it appropriate that to assist it properly the plaintiff needs to amend this complaint to let the plaintiff to amend this complaint and
- x. Any and all of his relief to which she may be entitled as it may become part of this Honorable Court's evaluation and judgment.
- xi. Terminate Sheriff Cerliano with his vile attitude and Chief Anthony Boone, effective immediately.

**DATED** this 07<sup>th</sup> day of February, 2023

Submitted to:

**Sheriff Cerliano**

Gregg Co. Sheriff's Department  
101 E Methvin St #559  
Longview, TX. 75601

**Chief Anthony Boone**

Longview Police Department  
302 W. Cotton St.  
Longview, Texas 75601



**Defendants**

Submitted by:

**Masika Brown Ray**  
(Pro Se Plaintiff)

**CERTIFICATE OF SERVICE:**

The plaintiff certifies that I have mailed and delivered this pleading to the office of below-mentioned attorney/defendant on the date mentioned in this complaint.

Original of this is filed with:  
**CLERK OF COURT**

Submitted to:

**Sheriff Cerliano**  
Gregg Co. Sheriff's Department  
101 E Methvin St #559  
Longview, TX. 75601

**Chief Anthony Boone**  
Longview Police Department  
302 W. Cotton St.  
Longview, Texas 75601

**Defendants**

Submitted by:

**Masika Brown Ray**  
(Pro Se Plaintiff)